

Message

From: Laura Green [laura.carolyn.green] Ex. 6 Personal Privacy (PP)
Sent: 12/7/2021 12:08:14 PM
To: Knott, Steven [Knott.Steven@epa.gov]
Subject: Fwd: Clarification of your roles as an EPA Special Government Employee

Dear Steve,

Ex. 6 Personal Privacy (PP)

Please respond. Thank you.

Laura C. Green, Ph.D., D.A.B.T.
President & Senior Toxicologist
Green Toxicology LLC

315 Beach Avenue, Hull, Massachusetts 02045
www.GreenToxicology.com

Ex. 6 Personal Privacy (PP) (cell)

----- Forwarded message -----

From: Laura Green <laura.carolyn.green> Ex. 6 Personal Privacy (PP)
Date: Mon, Dec 6, 2021 at 4:55 PM
Subject: Re: Clarification of your roles as an EPA Special Government Employee
To: Hughes, Hayley <hughes.hayley@epa.gov>
Cc: Knott, Steven <Knott.Steven@epa.gov>

Ex. 6 Personal Privacy (PP)

Laura C. Green, Ph.D., D.A.B.T.
President & Senior Toxicologist
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Ex. 6 Personal Privacy (PP) (cell)

On Mon, Dec 6, 2021 at 4:23 PM Hughes, Hayley <hughes.hayley@epa.gov> wrote:

Dear Dr. Green,

Thank you for your service as a Special Government Employee (SGE) to the Environmental Protection Agency's (EPA's) Science Advisory Committee on Chemicals (SACC) and the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Scientific Advisory Panel (SAP).

It has come to our attention that, when speaking in your personal capacity, you sometimes refer with ambiguity to your position as an SGE. While it is permissible to reference your position as an EPA SGE in certain contexts, please be mindful of the limitations.

In consultation with EPA's Ethics Office, I am taking this opportunity to clarify how you may refer to your SGE status when speaking in your personal capacity to comply with the federal ethics laws and regulations that apply to you while serving as an SGE. Pursuant to the Standards of Ethical Conduct for Employees in the Executive Branch, 5 C.F.R. Part 2635, you cannot "use or permit the use of [your] Government position or title or any authority associated with [your] public office *in a manner that can be construed to imply that [EPA] or the Government sanctions or endorses [your] personal activities*" (emphasis added). *See* 5 C.F.R. § 2635.702(b). When you are teaching, speaking, or writing in your non-EPA or personal capacity, then you "shall not use or permit the use of [your] official title or position to identify [you] in connection with [the] teaching, speaking or writing activity." To be clear, you may refer to your EPA title or position in connection with your personal activity only when it is offered as "one of several biographical details" provided that the EPA position is not given more prominence than other aspects of your professional or academic credentials. *See* 5 C.F.R. § 2635.807(b).

You may properly refer to your role as an EPA SGE, consulting with the SACC and SAP, for example, on your CV or as part of biographical information included in introductory remarks. You may not, however, use that designation to bolster your personal presentation or specific points contained in any remarks, or imply that the EPA or the federal government endorses your personal views. As an SGE, it is more precise to indicate that you work on an intermittent basis with an EPA Federal Advisory Committee rather than state that you are a "part-time" or "special" EPA employee. Should you include any reference to your EPA SGE position, then you must also include a clear disclaimer that your presentation is offered in your personal capacity only and is not on behalf of EPA. If you do not mention your EPA SGE position at all, then there is no need for a disclaimer.

We appreciate your attention to the limitations on referring to your EPA SGE position. Please contact me should you have questions.

Sincerely,

Hayley

Hayley Hughes, DrPH, MPH, CSP

Director, Office of Program Support

Deputy Ethics Official, Office of Program Support

Office of Chemical Safety and Pollution Prevention

US Environmental Protection Agency

Desk: 202.564.1116

Email: Hughes.hayley@epa.gov